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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES, LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Debtor.

**NOTICE OF AGENDA FOR MATTERS SCHEDULED
FOR HEARING ON OCTOBER 18, 2023 AT 10:00 A.M.**

CONTESTED MATTERS

1. **23-01017; Picard v. Natixis Financial Products, LLC, et al.**
 - A. Memorandum of Law in Support of Defendants' Motion to Dismiss filed by Joseph Cioffi on behalf of Bloom Asset Holdings Fund, Natixis Financial Products LLC (Filed: 5/22/2023) [ECF No. 18]

- B. Declaration Joseph Cioffi in Support of Defendants' Motion to Dismiss the Complaint filed by Joseph Cioffi on behalf of Bloom Asset Holdings Fund, Natixis Financial Products LLC (Filed: 5/22/2023) [ECF No. 19]

Opposition Due: August 7, 2023

Opposition Filed:

- C. Trustee's Memorandum of Law in Opposition to Defendants' Motion to Dismiss filed by Carlos Ramos-Mrosovsky on behalf of Irving H. Picard (Filed: 8/7/2023) [ECF No. 22]

Replies Due: September 21, 2023

Replies Filed:

- D. Reply Memorandum of Law in Further Support of Defendants' Motion to Dismiss filed by Joseph Cioffi on behalf of Natixis Financial Products LLC (Filed: 9/21/2023) [ECF No. 24]

Related Documents:

- E. Stipulation and order signed on 3/13/2023. (Kinchen, Gwen) (Entered: 03/13/2023) [ECF No. 5]
- F. Notice of Defendants' Motion to Dismiss filed by Joseph Cioffi on behalf of Bloom Asset Holdings Fund, Natixis Financial Products LLC (Filed: 5/22/2023) [ECF No. 17]
- G. Notice of Hearing on Defendants' Motion to Dismiss filed by Joseph Cioffi on behalf of Bloom Asset Holdings Fund, Natixis Financial Products LLC (Filed: 5/22/2023) [ECF No. 20]
- H. Stipulation and Order to Waive Oral Argument on Certain Issues Scheduled for Hearing on October 18, 2023 at 10:00 a.m. signed on 10/13/2023. (DuBois, Linda) (Entered: 10/13/2023) [ECF No. 26]

Status: This matter is going forward.

2. **10-05353; Picard v. Natixis, et al.**

- A. Memorandum of Law in Support of Defendant Natixis S.A.'s Motion to Dismiss filed by Joseph Cioffi on behalf of Natixis S.A. (Filed: 4/17/2023) [ECF No. 199]
- B. Declaration of Joseph Cioffi in Support of Defendant Natixis S.A.'s Motion to Dismiss filed by Joseph Cioffi on behalf of Natixis S.A. (Filed: 4/17/2023) [ECF No. 200]

Opposition Due: June 16, 2023

Opposition Filed:

- C. Trustee's Memorandum of Law in Opposition to Natixis S.A.'s Motion to Dismiss filed by David J. Sheehan on behalf of Irving H. Picard (Filed: 6/16/2023) [ECF No. 209]
- D. Declaration of Peter Fischer in Support of Trustee's Memorandum of Law in Opposition to Natixis S.A.'s Motion to Dismiss filed by David J. Sheehan on behalf of Irving H. Picard (Filed: 6/16/2023) [ECF No. 210]

Replies Due: July 31, 2023

Replies Filed:

- E. Reply Memorandum of Law in Further Support of Defendant Natixis S.A.'s Motion to Dismiss filed by Joseph Cioffi on behalf of Natixis S.A. (Filed: 7/31/2023) [ECF No. 214]

Related Documents:

- F. Stipulation and Order to Dismiss Without Prejudice Defendants Natixis Financial Products LLC and Bloom Asset Holdings Fund and File an Amended Complaint Against Defendants Natixis S.A. and Tensyr Limited (Kinchen, Gwen) (Entered: 01/10/2023) [ECF No. 192]
- G. Notice of Defendant Natixis S.A.'s Motion to Dismiss filed by Joseph Cioffi on behalf of Natixis S.A. (Filed: 4/17/2023) [ECF No. 198]
- H. Notice of Hearing on Defendant Natixis S.A.'s Motion to Dismiss filed by Joseph Cioffi on behalf of Natixis S.A. (Filed: 4/17/2023) [ECF No. 201]
- I. Stipulation and Order to Waive Oral Argument on Certain Issues Scheduled for Hearing on October 18, 2023 at 10:00 a.m. signed on 10/13/2023. (DuBois, Linda) (Entered: 10/13/2023) [ECF No. 220]

Status: This matter is going forward.

3. **10-05353; Picard v. Natixis, et al.**

- A. Memorandum of Law in Support of Motion to Dismiss the Amended Complaint filed by David Y. Livshiz on behalf of Tensyr Limited (Filed: 4/17/2023) [ECF No. 204]

- B. Declaration of Ellen Chislett in Support of Motion to Dismiss the Amended Complaint filed by David Y. Livshiz on behalf of Tensyr Limited (Filed: 4/17/2023) [ECF No. 205]
- C. Declaration of Christian J. Vandergeest in Support of Motion to Dismiss the Amended Complaint filed by David Y. Livshiz on behalf of Tensyr Limited (Filed: 4/17/2023) [ECF No. 206]

Opposition Due: June 16, 2023

Opposition Filed:

- D. Trustee's Memorandum of Law in Opposition to Tensyr Ltd.'s Motion to Dismiss filed by David J. Sheehan on behalf of Irving H. Picard (Filed: 6/16/2023) [ECF No. 211]

Replies Due: July 31, 2023

Replies Filed:

- E. Reply Memorandum of Law in Further Support of Defendant Tensyr Limited's Motion to Dismiss filed by David Y. Livshiz on behalf of Tensyr Limited (Filed: 7/31/2023) [ECF No. 216]

Related Documents:

- F. Stipulation and Order to Dismiss Without Prejudice Defendants Natixis Financial Products LLC and Bloom Asset Holdings Fund and File an Amended Complaint Against Defendants Natixis S.A. and Tensyr Limited (Kinchen, Gwen) (Entered: 01/10/2023) [ECF No. 192]
- G. Motion to Dismiss Adversary Proceeding filed by David Y. Livshiz on behalf of Tensyr Limited (Filed: 4/17/2023) [ECF No. 203]
- H. Notice of Hearing on Motion to Dismiss the Amended Complaint filed by David Y. Livshiz on behalf of Tensyr Limited (Filed: 4/17/2023) [ECF No. 207]
- I. Letter to the Honorable Cecelia G. Morris re: Supplemental Authority Filed by David Y. Livshiz on behalf of Tensyr Limited (Filed: 10/5/2023) [ECF No. 217]
- J. Letter to The Honorable Cecelia G. Morris re: Supplemental Authority Filed by David J. Sheehan on behalf of Irving H. Picard (Filed: 10/10/2023) [ECF No. 218]

- K. Stipulation and Order to Waive Oral Argument on Certain Issues Scheduled for Hearing on October 18, 2023 at 10:00 a.m. signed on 10/13/2023. (DuBois, Linda) (Entered: 10/13/2023) [ECF No. 220]

Status: This matter is going forward.

4. **10-05286; Picard v. Legacy Capital Ltd.**

- A. Letter to the Honorable Cecelia G. Morris regarding Request Pursuant to Local Rule 7007-1 for Pre-motion Discovery Conference Filed by David J. Sheehan on behalf of Irving H. Picard (Filed: 9/7/2023) [ECF No. 272]
- B. Declaration and Status Report of Jason S. Oliver in Support of Trustee's Request for Informal Conference Regarding Extension of Discovery Deadlines filed by David J. Sheehan on behalf of Irving H. Picard (Filed: 9/7/2023) [ECF No. 273]

Related Documents:

- C. Notice of Hearing to consider the Letter to the Honorable Cecelia G. Morris regarding Request Pursuant to Local Rule 7007-1 for Pre-motion Discovery Conference Filed by David J. Sheehan on behalf of Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, and Bernard L. Madoff filed by Clerk of Court, United States Bankruptcy Court, SDNY. with hearing to be held on 10/18/2023 at 10:00 AM at Videoconference (ZoomGov) (CGM) (Ashmeade, Vanessa) (Entered: 09/08/2023) [ECF No. 275]
- D. Letter to the Honorable Cecelia G. Morris re Trustee's Application for an Extension of Time Filed by Eric Fisher on behalf of Legacy Capital Ltd. (Filed: 10/12/2023) [ECF No. 276]
- E. Letter to the Honorable Cecelia G. Morris in Response to October 12, 2023 Letter to the Honorable Cecelia G. Morris re: Trustee's Application for an Extension of Time Filed by David J. Sheehan on behalf of Irving H. Picard (Filed: 10/16/2023) [ECF No. 277]

Status: This matter is going forward.

5. **20-01316; Picard v. Rafael Mayer, et al.**

- A. Letter to the Honorable Cecelia G. Morris regarding Request Pursuant to Local Rule 7007-1 for Pre-motion Discovery Conference Filed by David J. Sheehan on behalf of Irving H. Picard (Filed: 9/7/2023) [ECF No. 126]
- B. Declaration and Status Report of Jason S. Oliver in Support of Trustee's Request for Informal Conference Regarding Extension of Discovery Deadlines filed by David J. Sheehan on behalf of Irving H. Picard (Filed: 9/7/2023) [ECF No. 127]

Related Documents:

- C. Notice of Hearing to consider the Letter to the Honorable Cecelia G. Morris regarding Request Pursuant to Local Rule 7007-1 for Pre-motion Discovery Conference Filed by David J. Sheehan on behalf of Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, and Bernard L. Madoff filed by Clerk of Court, United States Bankruptcy Court, SDNY. with hearing to be held on 10/18/2023 at 10:00 AM at Videoconference (ZoomGov) (CGM) (Ashmeade, Vanessa) (Entered: 09/08/2023) [ECF No. 129]
- D. Letter in Response to Trustee's Request for Conference Regarding Extension of Discovery Deadlines Filed by Daniel H. Tabak on behalf of Prince Capital Partners LLC, Prince Resources LDC (Filed: 10/12/2023) [ECF No. 131]
- E. Declaration and Status Report of Daniel H. Tabak in Response to Trustee's Request for Conference Regarding Extension of Discovery Deadlines Filed by Daniel H. Tabak on behalf of Prince Capital Partners LLC, Prince Resources LDC (Filed: 10/12/2023) [ECF No. 131]
- F. Letter to the Honorable Cecelia G. Morris in Response to October 12, 2023 Letter in Response to Trustee's Request for Conference Regarding Extension of Discovery Deadlines Filed by David J. Sheehan on behalf of Irving Picard (Filed: 10/16/2023) [ECF No. 133]

Status: This matter is going forward.

Dated: October 16, 2023
New York, New York

Respectfully submitted,

/s/ David J. Sheehan
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Liquidation of Bernard L. Madoff Investment
Securities LLC and the Chapter 7 Estate of
Bernard L. Madoff*